



LARUSSO, CONWAY & BARTLING  
ATTORNEYS AT LAW

March 20, 2020

Via Email: [rtolchin@berkmanlaw.com](mailto:rtolchin@berkmanlaw.com)

Robert Joseph Tolchin  
The Berkman Law Office, LLC  
111 Livingston Street, Suite 1928  
Brooklyn, New York 11201

Re: Zeitlin v. Palumbo, et al  
Civil Docket No. 20-cv-00510-BMC

Dear Mr. Tolchin:

Hope this email finds you well. As you recall this firm has been retained to represent Global Telecommunications in the aforementioned matter.

Due to the ongoing coronavirus pandemic our office is currently closed and we are working remotely to the best of our ability. Pursuant to Judge Mauskopf's administrative orders issued this past week, most if not all non-essential functions of the courts are closed until further notice.

Accordingly, it is respectfully requested that you grant this office a forty (45) day extension to file an answer, move against or otherwise respond to the Complaint.

Thank you very much for your anticipated cooperation, and should you have any further questions, please do not hesitate to contact me.

Very truly Yours,

/s/ Joseph R. Conway  
Joseph R. Conway

cc: Honorable Judge Brian M. Cogan  
United States District Court  
Eastern District of New York  
(via ECF)